

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE JUUL LABS, INC.,
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

Case No. 19-md-02913-WHO

**TRIAL TESTIMONY AND EXHIBITS
FROM THE VIDEOTAPED TESTIMONY
OF CHAMESHEANN WAKEFIELD
PLAYED AT TRIAL**

This Document Relates to:

***San Francisco Unified School District v.
Juil Labs, Inc. et al., Case No. 3:19-cv-
08177***

Plaintiff, by and through its undersigned attorneys, hereby docket the following:

1. **Exhibit 1** is a report of the videotaped testimony of Chamesheann Wakefield that was played to the jury on April 28, 2023. The testimony in blue 00:43:42 and light blue 00:00:17 is Plaintiff's affirmative and counter-counter designations.
2. **Exhibit 2**: is a *Joint Stipulation Identifying Trial Exhibits Used In Videotaped Depositions of Chamesheann Wakefield Played at Trial* that sets forth all of the Trial Exhibits from the videotaped testimony of Chamesheann Wakefield admitted into evidence by the Court.

Respectfully submitted,

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EXHIBIT 1

Wakefield, Chamesheann SFUSD

FINAL_PLAYED 04-26-23

Designation List Report



Wakefield, Camesheann

2022-10-14

PLF AFFIRMATIVE	00:43:42
DEF COUNTER	00:01:46
PLF COUNTER-COUNTER	00:00:17
TOTAL RUN TIME	00:45:45



Documents linked to video:

WAKEFIELD-1
 WAKEFIELD-2
 WAKEFIELD-3
 WAKEFIELD-7
 WAKEFIELD-8
 WAKEFIELD-9
 WAKEFIELD-10
 WAKEFIELD-11
 WAKEFIELD-12
 WAKEFIELD-13
 WAKEFIELD-15
 WAKEFIELD-16
 WAKEFIELD-21
 WAKEFIELD-22
 WAKEFIELD-23
 WAKEFIELD-27
 WAKEFIELD-28



ID: WC_v13

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
12:21 - 13:02	Wakefield, Camesheann 2022-10-14 12:21 Q. Good morning. 12:22 A. Good morning. Good morning, 12:23 everyone. 12:24 Q. Good morning. 12:25 Would you please tell us your 13:01 name? 13:02 A. Camesheann Tabitha Wakefield.	00:00:08	WC_v13.1
14:06 - 14:19	Wakefield, Camesheann 2022-10-14 14:06 Q. Did you attend a JUUL launch 14:07 party in New York City on June 4, 2015? 14:08 A. Yes. 14:09 Q. How old were you at the time of 14:10 that JUUL launch party? 14:11 A. 18. 14:12 Q. Were you in high school or were 14:13 you in college at the time of that JUUL party 14:14 in 2015? 14:15 A. My first year of college. 14:16 Q. Where did you go to high 14:17 school? 14:18 A. New York City Lab School for 14:19 Collaborative Studies.	00:00:26	WC_v13.2
15:10 - 15:12	Wakefield, Camesheann 2022-10-14 15:10 Q. Would you explain to us how it 15:11 was that you ended up being involved in that 15:12 JUUL launch party in June of 2015?	00:00:09	WC_v13.3
15:17 - 15:23	Wakefield, Camesheann 2022-10-14 15:17 A. I was asked to promote the 15:18 party and bring guests. 15:19 Q. Who asked you to promote the 15:20 party? 15:21 A. COACD. 15:22 Q. COACD? 15:23 A. Yes.	00:00:10	WC_v13.4
15:24 - 16:01	Wakefield, Camesheann 2022-10-14 15:24 Q. And does that individual go by 15:25 another name as well? 16:01 A. Douglas Perrett.	00:00:05	WC_v13.5

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
16:02 - 16:03	Wakefield, Chamesheann 2022-10-14 16:02 Q. And who is Douglas Perrett? 16:03 A. He's a casting director.	00:00:05	WC_v13.6
16:04 - 16:08	Wakefield, Chamesheann 2022-10-14 16:04 Q. And if he's a casting director, 16:05 what sorts of things does he cast, in your 16:06 experience? 16:07 A. Modeling, commercials, photo 16:08 shoots, stuff like that.	00:00:11	WC_v13.7
16:20 - 17:01	Wakefield, Chamesheann 2022-10-14 16:20 Q. How did you know 16:21 Mr. Perrett? 16:22 A. He would -- being that he's a 16:23 casting director and I threw parties, 16:24 sometimes he would come to the parties to 16:25 cast from there. And he also was like, I 17:01 guess, a mother agent to some of my friends.	00:00:16	WC_v13.8
17:02 - 17:17	Wakefield, Chamesheann 2022-10-14 17:02 Q. Okay. And when you say that 17:03 Mr. Perrett sometimes would come to parties 17:04 that you hosted and he would cast from there, 17:05 can you explain a little more about what you 17:06 mean? 17:07 A. I would throw, like, I wouldn't 17:08 say a rave but like a party, and there would 17:09 be a few hundred teens there. And then, you 17:10 know, if he seen a new fresh face, he could 17:11 like bring them into the agency and stuff 17:12 like that. 17:13 Q. Okay. So did it seem to you 17:14 when Mr. Perrett would come to some of your 17:15 parties that he was basically scouting for 17:16 new talent? 17:17 A. Yes.	00:00:31	WC_v13.9
17:19 - 17:23	Wakefield, Chamesheann 2022-10-14 17:19 A. That's fair. 17:20 Q. Were the folks that attended 17:21 your parties typically pretty young? 17:22 A. Yes.	00:00:07	WC_v13.10

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	17:23 Q. Some in high school?		
17:24 - 17:24	Wakefield, Chamesheann 2022-10-14	00:00:01	WC_v13.11
	17:24 A. Yes.		
18:03 - 18:07	Wakefield, Chamesheann 2022-10-14	00:00:06	WC_v13.12
	18:03 Q. A lot in high school?		
	18:04 A. Yes.		
	18:05 Q. Were you throwing some of these		
	18:06 parties while you were in high school?		
	18:07 A. Yes.		
20:18 - 21:01	Wakefield, Chamesheann 2022-10-14	00:00:16	WC_v13.13
	20:18 Q. Did Mr. Perrett invite you to		
	20:19 the JUUL launch party on June 4, 2015?		
	20:20 A. Yes.		
	20:21 Q. How did he invite you to the		
	20:22 party?		
	20:23 A. With an invitation.		
	20:24 Q. Did he send you some sort of an		
	20:25 invitation?		
	21:01 A. Yeah, it was a flyer.		
21:06 - 21:09	Wakefield, Chamesheann 2022-10-14	00:00:11	WC_v13.14
	21:06 Q. And when Mr. Perrett invited		
	21:07 you to that JUUL launch party, at that time		
	21:08 did he ask you to work it? I think the word		
	21:09 you used was to help promote it?		
21:11 - 21:21	Wakefield, Chamesheann 2022-10-14	00:00:26	WC_v13.15
	21:11 THE WITNESS: Yes.		
	21:12 QUESTIONS BY MR. KIEFFER:		
	21:13 Q. And what did you understand		
	21:14 that you were supposed to do at the JUUL		
	21:15 launch party or in connection with it?		
	21:16 A. Put together a guest list, so		
	21:17 invite people, have them come by and just		
	21:18 give -- have good vibes.		
	21:19 Q. Okay. Do you know, were you		
	21:20 also expected to post on your social media		
	21:21 accounts about the event?		
21:24 - 22:09	Wakefield, Chamesheann 2022-10-14	00:00:12	WC_v13.16
	21:24 THE WITNESS: Yes.		
	21:25		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	22:01 QUESTIONS BY MR. KIEFFER:		
	22:02 Q. Did you do all of those things?		
	22:03 A. Yes.		
	22:04 Q. Okay. You put together a guest		
	22:05 list?		
	22:06 A. Yes.		
	22:07 Q. And did you post on your social		
	22:08 media about the event?		
	22:09 A. Yes.		
22:12 - 22:14	Wakefield, Chamesheann 2022-10-14	00:00:06	WC_v13.17
	22:12 How many people did Mr. Perrett		
	22:13 tell you to invite to the JUUL launch party,		
	22:14 if he did?		
22:16 - 22:23	Wakefield, Chamesheann 2022-10-14	00:00:14	WC_v13.18
	22:16 THE WITNESS: I invited about		
	22:17 50-plus people.		
	22:18 QUESTIONS BY MR. KIEFFER:		
	22:19 Q. Did Mr. Perrett put any limits		
	22:20 on the number of people you could invite?		
	22:21 A. No.		
	22:22 Q. Did he tell you you could		
	22:23 invite anybody you wanted to?		
22:25 - 23:06	Wakefield, Chamesheann 2022-10-14	00:00:18	WC_v13.19
	22:25 THE WITNESS: Yes.		
	23:01 QUESTIONS BY MR. KIEFFER:		
	23:02 Q. Did Mr. Perrett, when he asked		
	23:03 you to help promote the JUUL launch party,		
	23:04 did he put any limits on the type of people		
	23:05 or the ages of people that you should invite?		
	23:06 A. No.		
23:19 - 23:23	Wakefield, Chamesheann 2022-10-14	00:00:09	WC_v13.20
	23:19 QUESTIONS BY MR. KIEFFER:		
	23:20 Q. Did Mr. Perrett tell you that		
	23:21 you should be sure that the only people that		
	23:22 you invited to this party were adults who		
	23:23 already smoked cigarettes?		
23:25 - 24:07	Wakefield, Chamesheann 2022-10-14	00:00:21	WC_v13.21
	23:25 THE WITNESS: No.		
	24:01 QUESTIONS BY MR. KIEFFER:		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	24:02 Q. When Mr. Perrett asked you to		
	24:03 help promote this JUUL launch party, what did		
	24:04 he tell you about that party? What was it		
	24:05 going to be like?		
	24:06 A. A vape giveaway, deejays.		
	24:07 Yeah, pretty much that.		
24:14 - 24:21	Wakefield, Chamesheann 2022-10-14	00:00:22	WC_v13.22
	24:14 Q. Did it sound like a good party,		
	24:15 at least as the way he described it to you?		
	24:16 A. Yeah. Deejays, vape giveaway,		
	24:17 open bar. Everyone loves free stuff, so...		
	24:18 Q. And when Mr. Perrett asked you		
	24:19 to promote this JUUL launch party, did you		
	24:20 have some understanding of why he reached out		
	24:21 to you to do that as opposed to someone else?		
24:24 - 25:14	Wakefield, Chamesheann 2022-10-14	00:00:26	WC_v13.23
	24:24 THE WITNESS: My influence in		
	24:25 the culture in New York City or in		
	25:01 general --		
	25:02 QUESTIONS BY MR. KIEFFER:		
	25:03 Q. All right.		
	25:04 A. -- at the time.		
	25:05 Q. Are you a musician?		
	25:06 A. Yes.		
	25:07 Q. And were you then?		
	25:08 A. I think I just started, yeah.		
	25:09 Q. Would you describe yourself at		
	25:10 that time in 2015 as somebody that had a		
	25:11 fairly large circle of friends and		
	25:12 acquaintances in New York City, at least for		
	25:13 someone your age?		
	25:14 A. Yes.		
26:13 - 26:18	Wakefield, Chamesheann 2022-10-14	00:00:13	WC_v13.24
	26:13 Q. When Mr. Perrett asked you to		
	26:14 help promote this JUUL launch party, were you		
	26:15 paid for that?		
	26:16 A. Yes.		
	26:17 Q. Who paid you?		
	26:18 A. Douglas.		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
26:19 - 27:01	Wakefield, Camesheann 2022-10-14 26:19 Q. How much did he pay 26:20 you? 26:21 A. \$200. 26:22 Q. Did Mr. Perrett pay you the 26:23 \$200 before the event or after the event? 26:24 A. In the event, toward the end. 26:25 Q. How did he pay you? 27:01 A. Cash.	00:00:14	WC_v13.25
28:08 - 28:12	Wakefield, Camesheann 2022-10-14 28:08 Q. Tabby, Exhibit Number 1, which 28:09 I just handed you and which is on the screen, 28:10 is that the invitation that Mr. Perrett sent 28:11 you? 28:12 A. Yes.	00:00:10	WC_v13.26
29:05 - 29:09	Wakefield, Camesheann 2022-10-14 29:05 Q. Did you post the invitation, 29:06 Exhibit Number 1, on your social media? 29:07 A. Yes. 29:08 Q. Where did you post it? 29:09 A. Instagram.	00:00:10	WC_v13.27
29:20 - 29:25	Wakefield, Camesheann 2022-10-14 29:20 Q. You did that to partly help 29:21 spread the word? 29:22 A. Yeah, just sort of like get the 29:23 invite out. 29:24 (Wakefield Exhibit 2 marked for 29:25 identification.)	00:00:05	WC_v13.28
30:04 - 30:22	Wakefield, Camesheann 2022-10-14 30:04 And, Tabby, is Exhibit Number 2 30:05 that you have there, is that a copy of the 30:06 invitation to the JUUL launch party that you 30:07 posted on your Instagram account? 30:08 A. Yes. 30:09 Q. And at the bottom of that page, 30:10 there's some text. 30:11 Is that text that you put there	00:00:44	WC_v13.29



WAKEFIELD-1.

1





Clear



WAKEFIELD-2.

1.1

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
 WAKEFIELD-2. 1.2	30:12	when you posted it?	
	30:13	A. Yeah, I typed it that.	
	30:14	Q. Can you read for us what you	
	30:15	wrote there?	
	30:16	A. "Free music, food, open bar and	
	30:17	vape giveaway. There is a list, so RSV --	
	30:18	RSVP to me with the name on your ID" -- oops,	
	30:19	"with the name on ID, and, yeah, starts at	
	30:20	7 p.m., around" -- "and, yeah, starts at	
	30:21	7 p.m. around 30th at and 8th Avenue."	
	30:22	That's a typo in there.	
	31:06 - 31:09	Wakefield, Camesheann 2022-10-14	00:00:08 WC_v13.30
	31:06	Q. And then besides putting this	
	31:07	invitation on social media, did you	
 Clear	31:08	personally invite other people to the party?	
	31:09	A. Yes.	
	31:13 - 31:15	Wakefield, Camesheann 2022-10-14	00:00:08 WC_v13.31
	31:13	Q. Do you remember about how many	
31:23 - 32:10	31:14	of the folks you invited attended?	
	31:15	A. 25-plus. It was a --	
	31:23	Q. At the time of that JUUL launch	
	31:24	party in 2015, did you still have friends and	
	31:25	acquaintances who were still in high school?	
	32:01	A. Yes.	
	32:02	Q. Did you invite some of them to	
	32:03	the JUUL launch party that you had been hired	
	32:04	to help promote?	
	32:05	A. Yes.	
	32:06	Q. And did some of those friends	
	32:07	and acquaintances of yours who were still in	
	32:08	high school attend that JUUL launch party at	
	32:09	your invitation in 2015?	
	32:10	A. Yes.	
	32:22 - 32:25	Wakefield, Camesheann 2022-10-14	00:00:07 WC_v13.33
	32:22	Q. When you went into the venue,	
	32:23	did anyone ask you to show identification at	
	32:24	the door?	

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	32:25 A. No.		
33:20 - 34:01	Wakefield, Chamesheann 2022-10-14	00:00:15	WC_v13.34
	33:20 Q. Did you see any of your friends		
	33:21 get their IDs checked at the door?		
	33:22 A. No.		
	33:23 Q. Did anyone ask to see your ID		
	33:24 at any point during that JUUL party after you		
	33:25 got inside?		
	34:01 A. No.		
34:02 - 34:16	Wakefield, Chamesheann 2022-10-14	00:00:20	WC_v13.35
	34:02 Q. Do you remember any of your		
	34:03 friends having to show ID at any point once		
	34:04 they were inside?		
	34:05 A. No.		
	34:06 Q. Was alcohol being served at		
	34:07 this party?		
	34:08 A. Yes.		
	34:09 Q. Did you get drinks at the		
	34:10 party?		
	34:11 A. Yes.		
	34:12 Q. Did you have to pay for that		
	34:13 alcohol?		
	34:14 A. No.		
	34:15 Q. Was it an open bar?		
	34:16 A. Yes.		
34:22 - 34:24	Wakefield, Chamesheann 2022-10-14	00:00:03	WC_v13.36
	34:22 Q. Did anyone check your ID at the		
	34:23 bar?		
	34:24 A. No.		
35:12 - 35:13	Wakefield, Chamesheann 2022-10-14	00:00:04	WC_v13.37
	35:12 Q. Okay. Was there a lot of what		
	35:13 people sometimes call swag at the party?		
35:15 - 35:25	Wakefield, Chamesheann 2022-10-14	00:00:10	WC_v13.38
	35:15 THE WITNESS: Like a -- the		
	35:16 stuff in the party --		
	35:17 QUESTIONS BY MR. KIEFFER:		
	35:18 Q. Yeah.		
	35:19 A. -- or the people?		
	35:20 Q. Koozies, JUUL koozies.		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	35:21 A. Oh, yeah, there were koozies.		
	35:22 It was cool.		
	35:23 Q. Were your friends able to get		
	35:24 drinks at the party?		
	35:25 A. Yes.		
36:06 - 36:10	Wakefield, Chamesheann 2022-10-14	00:00:09	WC_v13.39
	36:06 QUESTIONS BY MR. KIEFFER:		
	36:07 Q. Were most of the friends that		
	36:08 attended this party at your invitation under		
	36:09 21 years old at the time?		
	36:10 A. Yes.		
37:20 - 37:25	Wakefield, Chamesheann 2022-10-14	00:00:15	WC_v13.40
	37:20 as someone		
	37:21 who lived in New York at the time in		
	37:22 June 2015, as far as you understood, it		
	37:23 wouldn't be legal for somebody under 21 years		
	37:24 old in New York City to either be served		
	37:25 alcohol or to be given tobacco products?		
38:03 - 38:03	Wakefield, Chamesheann 2022-10-14	00:00:02	WC_v13.41
	38:03 THE WITNESS: Not legal, no.		
38:05 - 38:10	Wakefield, Chamesheann 2022-10-14	00:00:10	WC_v13.42
	38:05 Q. Did you sample JUUL product at		
	38:06 this party?		
	38:07 A. Yes.		
	38:08 Q. Was there something like a		
	38:09 sample bar where you could try the product?		
	38:10 A. Yes.		
38:14 - 38:16	Wakefield, Chamesheann 2022-10-14	00:00:04	WC_v13.43
	38:14 Q. Did you have to pay for any of		
	38:15 the JUUL products that you tried?		
	38:16 A. No.		
38:19 - 38:25	Wakefield, Chamesheann 2022-10-14	00:00:12	WC_v13.44
	38:19 Q. Do you know if your friends		
	38:20 sampled the product?		
	38:21 A. Yes.		
	38:22 Q. As far as you could tell from		
	38:23 being around your friends and mingling with		
	38:24 them that evening, did it appear to you that		
	38:25 all your friends tried the JUUL product?		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
39:02 - 39:02	Wakefield, Chamesheann 2022-10-14 39:02 THE WITNESS: Yes.	00:00:01	WC_v13.45
39:04 - 39:09	Wakefield, Chamesheann 2022-10-14 39:04 Q. Do you recall seeing any of 39:05 your friends ever be asked to show ID at that 39:06 sample bar before they could try JUUL? 39:07 A. No. 39:08 Q. What did you sample of JUUL, if 39:09 you remember?	00:00:15	WC_v13.46
39:11 - 40:12	Wakefield, Chamesheann 2022-10-14 39:11 THE WITNESS: They had like 39:12 three starter flavors, I believe, 39:13 three or four. I think it was three. 39:14 And they also had like vape mods in 39:15 the sample bar that weren't JUULs. 39:16 They were like bigger vape mods, yeah. 39:17 QUESTIONS BY MR. KIEFFER: 39:18 Q. Okay. 39:19 A. So we sampled those. 39:20 Q. The three or four starter 39:21 flavors that you referred to, do you recall 39:22 what those were? 39:23 A. Mint, tobacco and fruit punch. 39:24 There was a yellow one, I think. I don't 39:25 know if that yellow one -- I don't know if 40:01 that the yellow one was in there, but I'm 40:02 pretty sure the -- there was like green, 40:03 brown and red, I remember specifically. 40:04 Q. And do you know if you -- do 40:05 you remember if you sampled all of those or 40:06 just some of those? 40:07 A. In the -- in the party? 40:08 Q. Yes. 40:09 A. I only sampled like the mint 40:10 flavor, I think. 40:11 Q. Okay. What did you think of 40:12 the JUUL product when you sampled it?	00:00:56	WC_v13.47
40:14 - 40:21	Wakefield, Chamesheann 2022-10-14 40:14 THE WITNESS: I thought it was	00:00:17	WC_v13.48

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	40:15 like a sleek, kind of like		
	40:16 inconspicuous thing, and I knew what		
	40:17 PAX was. So I kind of just assumed it		
	40:18 was like -- just like that.		
	40:19 QUESTIONS BY MR. KIEFFER:		
	40:20 Q. When you sampled the JUUL		
	40:21 product, did you think it was cool?		
40:23 - 40:23	Wakefield, Chamesheann 2022-10-14	00:00:01	WC_v13.49
	40:23 THE WITNESS: Yeah.		
41:09 - 41:12	Wakefield, Chamesheann 2022-10-14	00:00:05	WC_v13.50
	41:09 QUESTIONS BY MR. KIEFFER:		
	41:10 Q. Were you given some of the JUUL		
	41:11 product to take home with you after the end		
	41:12 of the party?		
41:14 - 41:14	Wakefield, Chamesheann 2022-10-14	00:00:01	WC_v13.51
	41:14 THE WITNESS: Yes.		
41:17 - 42:14	Wakefield, Chamesheann 2022-10-14	00:00:50	WC_v13.52
	41:17 How much JUUL product did you		
	41:18 take home with you?		
	41:19 A. Enough for like to not buy JUUL		
	41:20 again for at least a year and a half, two.		
	41:21 Q. Did you have to pay for the		
	41:22 JUUL product that you got that night, that		
	41:23 you took home?		
	41:24 A. No.		
	41:25 Q. So how did that work? Did they		
	42:01 give it to you, or was there just a place		
	42:02 where you could take whatever you wanted?		
	42:03 A. No, there was a sample bar, and		
	42:04 they would, like, pass them out. But then		
	42:05 towards the end of the night, it became more,		
	42:06 like, chill, so you could, like, grab a bunch		
	42:07 and, like, go home.		
	42:08 Q. At the sample bar, were you		
	42:09 allowed to take as much as you wanted?		
	42:10 A. They were giving out -- they		
	42:11 were -- at the sample bar, they would give		
	42:12 out the flavor pack and then the actual body.		
	42:13 So there was like two different boxes of		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	42:14 things.		
43:11 - 43:13	Wakefield, Chamesheann 2022-10-14	00:00:05	WC_v13.53
	43:11 Q. Did some of your friends take		
	43:12 free samples home with them as well?		
	43:13 A. Yeah. Yes.		
43:19 - 43:21	Wakefield, Chamesheann 2022-10-14	00:00:04	WC_v13.54
	43:19 Q. Were there photographers at		
	43:20 this party?		
	43:21 A. Yes.		
43:25 - 44:01	Wakefield, Chamesheann 2022-10-14	00:00:02	WC_v13.55
	43:25 Q. How many photographs were taken		
	44:01 of you and your friends?		
44:04 - 44:05	Wakefield, Chamesheann 2022-10-14	00:00:03	WC_v13.56
	44:04 THE WITNESS: Probably like a		
	44:05 hundred, yeah.		
44:17 - 44:21	Wakefield, Chamesheann 2022-10-14	00:00:06	WC_v13.57
	44:17 Were you encouraged to do		
	44:18 anything with those photos?		
	44:19 A. Like in them or like --		
	44:20 Q. Yeah, first let's say in them,		
	44:21 right.		
44:23 - 46:01	Wakefield, Chamesheann 2022-10-14	00:01:00	WC_v13.58
	44:23 THE WITNESS: Well, there was a		
	44:24 competition, like a billboard campaign		
	44:25 competition, so that was kind of the		
	45:01 incentive of taking -- there was like		
	45:02 one spot with photos when you walk in.		
	45:03 There was like a backdrop, and they		
	45:04 used that to submit for this billboard		
	45:05 campaign, which it was on like -- it		
	45:06 would be on Times Square, so that was		
	45:07 pretty cool.		
	45:08 But then around the party they		
	45:09 were just taking pictures. Kind of		
	45:10 just organic stuff of like what we		
	45:11 were doing anyway, so it wasn't like		
	45:12 posing or staged. It was -- we were		
	45:13 literally all just in the moment doing		
	45:14 that, except for -- there's like, you		




WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	45:15 know, taking photos, go like that.		
	45:16 So, yeah.		
	45:17 QUESTIONS BY MR. KIEFFER:		
	45:18 Q. The billboard campaign that you		
	45:19 mentioned, was it your understanding when you		
	45:20 were at that party that you, in taking		
	45:21 certain photos, were actually kind of trying		
	45:22 to compete to get on this billboard?		
	45:23 A. Yes.		
	45:24 Q. And the billboard campaign you		
	45:25 mentioned had to do with Times Square?		
	46:01 A. Yes.		
47:12 - 47:20	Wakefield, Camesheann 2022-10-14	00:00:19	WC_v13.59
 WAKEFIELD-3. 1.1	47:12 Q. So I have just handed you what		
	47:13 we have marked as Exhibit Number 3. This is		
	47:14 a group of photographs that we got from		
	47:15 JUUL's files in this case, and we assembled		
	47:16 them and put page numbers in the lower		
	47:17 right-hand corner of each page.		
	47:18 Do you see the page numbers I'm		
	47:19 referring to?		
	47:20 A. Yeah.		
48:06 - 48:13	Wakefield, Camesheann 2022-10-14	00:00:19	WC_v13.60
	48:06 Q. We're not going to look at		
	48:07 every one of the pages in Exhibit Number 3,		
	48:08 but right now I just want to ask you about		
	48:09 the picture on the first page.		
	48:10 Do you recognize that picture?		
	48:11 A. Yes.		
	48:12 Q. And who all is in that picture?		
	48:13 A. Some of my really good friends.		
73:16 - 73:22	Wakefield, Camesheann 2022-10-14	00:00:14	WC_v13.61
 WAKEFIELD-3. 2.2	73:16 Q. let's go back		
	73:17 and look at the second page of that exhibit.		
	73:18 A. Yes.		
	73:19 Q. And will you tell us who is in		
	73:20 that photo and -- who's the persons and your		
	73:21 best recollection of their age at the time of		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	73:22 this party in 2015?		
73:24 - 74:01	Wakefield, Camesheann 2022-10-14	00:00:07	WC_v13.62
	73:24 THE WITNESS: Julius Kani		
	73:25 Biggs, Alyssa Bourne Peters and		
	74:01 myself, and we are all 18.		
75:10 - 76:04	Wakefield, Camesheann 2022-10-14	00:00:55	WC_v13.63
 WAKEFIELD-3. 4.1	75:10 Q. Turn, if you would, to the next		
	75:11 page of that same exhibit, Exhibit 3. Page 4		
	75:12 of Exhibit 3.		
	75:13 A. Yes.		
	75:14 Q. Who is shown in that photo that		
	75:15 you recognize?		
	75:16 A. Myself, Marielle Caroline		
	75:17 Koladyzn, Mimi Sweeney and Lucy Borden.		
	75:18 Q. And what were the ages of each		
	75:19 of the other three in that photo?		
	75:20 A. Me, 18; Marielle, 18; Mimi, 17;		
	75:21 and Lucy, 17.		
 WAKEFIELD-3. 5.1	75:22 Q. Turn, if you would, to the next		
	75:23 page, page 5, of Exhibit 3.		
	75:24 A. Yes.		
	75:25 Q. And who is shown in that photo		
	76:01 and their ages at the time of this party?		
	76:02 A. Lucy Borden, Mimi Sweeney and		
	76:03 myself. 17, 17, 18, going from the left to		
	76:04 the right.		
77:03 - 78:03	Wakefield, Camesheann 2022-10-14	00:01:02	WC_v13.64
 WAKEFIELD-3. 7.1	77:03 Q. Take a look at the next page,		
	77:04 if you would, which is page 7 of Exhibit 3.		
	77:05 A. Yes.		
	77:06 Q. And identify for us, if you		
	77:07 would, the names and the ages of each of the		
	77:08 folks in that photo.		
	77:09 A. Nice Chanel bag.		
	77:10 Charlie Pierce, Tino Tsanos and		
	77:11 Allie Shields Weber, and they're all 18.		
	77:12 Q. And what is Tino doing in that		



WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
 WAKEFIELD-3. 8.1	77:13	photograph, if you can tell?	
	77:14	A. He's JUUL'ing.	
	77:15	Q. Take a look at the next page,	
	77:16	if you would, page 8 of Exhibit 3.	
	77:17	A. Uh-huh.	
	77:18	Q. Who is shown in that photo?	
	77:19	A. Talulah Gilroy and Zoe Nochlin.	
	77:20	Q. And what were their ages at the	
	77:21	time?	
	77:22	A. 18.	
 WAKEFIELD-3. 9.1	77:23	Q. Take a look at page 9 of	
	77:24	Exhibit 3, if you would.	
	77:25	Can you tell us the names and	
	78:01	the ages of the folks in that photo?	
	78:02	A. Mimi Sweeney, Lucy Borden and	
	78:03	Talulah Gilroy, 17, 17 and 18.	
	81:11 - 81:19	Wakefield, Camesheann 2022-10-14	00:00:30 WC_v13.65
	 WAKEFIELD-3. 14.1	81:11	Q. Turn to page 14, if you would.
		81:12	Whose pictures are in -- are on
		81:13	page 14 of Exhibit 3?
		81:14	A. The guy, I can't see his face.
		81:15	I'll just go from the left to the right.
		81:16	This is Arianna. She is 17.
		81:17	She was on my soccer team. Bianca Paholak,
		81:18	18, and then her little sister Milah Paholak,
		81:19	who was 17. 16, 17, yeah.
 WAKEFIELD-3. 17.1	83:01 - 83:08	Wakefield, Camesheann 2022-10-14	00:00:21 WC_v13.66
	 WAKEFIELD-3. 17.1	83:01	Q. Turn, if you would, to page 17
		83:02	of Exhibit 3.
		83:03	A. Yeah.
		83:04	Q. Okay. Who are the two
		83:05	gentlemen in the foreground of that picture?
		83:06	A. Nick Delgado, the taller one,
		83:07	and Frank Perdomo. Frank was like 16. He
		83:08	recently passed away. And Nick is like 19.
		84:15 - 84:19	Wakefield, Camesheann 2022-10-14 00:00:14 WC_v13.67

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
 WAKEFIELD-7. 1.1	84:15 Q. Does this appear to you, 84:16 Exhibit 7, to be a color version of the photo 84:17 that we just looked at a moment ago, which is 84:18 page 18 of Exhibit Number 3? 84:19 A. Yes.		WC_v13.67
85:17 - 85:20  Clear	Wakefield, Chamesheann 2022-10-14 85:17 Q. Okay. At this party on June 4, 85:18 2015, did you meet anyone that was associated 85:19 with the company JUUL? 85:20 A. Yes.	00:00:09	WC_v13.68
86:02 - 86:04	Wakefield, Chamesheann 2022-10-14 86:02 Q. Did you have an understanding 86:03 as to how they were associated with the 86:04 company or their role?	00:00:06	WC_v13.69
86:07 - 86:10	Wakefield, Chamesheann 2022-10-14 86:07 THE WITNESS: They were 86:08 introduced to me as -- they had worked 86:09 with PAX, and now they made JUUL, 86:10 yeah.	00:00:08	WC_v13.70
86:13 - 86:15	Wakefield, Chamesheann 2022-10-14 86:13 A. One of its founders was 86:14 definitely -- they were like we own -- you 86:15 know, we founded JUUL.	00:00:08	WC_v13.71
86:25 - 87:04	Wakefield, Chamesheann 2022-10-14 86:25 Q. In response to your last 87:01 question, folks that you said you were 87:02 introduced to as something like founders, who 87:03 introduced you? 87:04 A. Douglas Perrett.	00:00:08	WC_v13.72
87:23 - 88:13  WAKEFIELD-8. 1.1	Wakefield, Chamesheann 2022-10-14 87:23 Q. Handing you Exhibit 8, do 87:24 you -- have you seen anybody in that photo 87:25 before? 88:01 A. Before the event or at the 88:02 event -- 88:03 Q. Before today. 88:04 A. I met this person.	00:00:38	WC_v13.73

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	88:05 Q. Okay. When you say you met		
	88:06 this person in Exhibit 8, which person are		
	88:07 you referring to?		
	88:08 A. The male, not the female.		
	88:09 Q. Okay. And how did you meet the		
	88:10 male in Exhibit 8?		
	88:11 A. Oh, I met him and another male		
	88:12 with Douglas, and we just shook hands, said		
	88:13 hi.		
88:21 - 88:25	Wakefield, Chamesheann 2022-10-14	00:00:09	WC_v13.74
	88:21 QUESTIONS BY MR. KIEFFER:		
	88:22 Q. And did you have any		
	88:23 understanding whether the man whose picture		
	88:24 is in Exhibit 8 was associated with some		
	88:25 JUUL -- with JUUL in some way?		
89:03 - 89:07	Wakefield, Chamesheann 2022-10-14	00:00:05	WC_v13.75
	89:03 THE WITNESS: Well, once I met		
	89:04 him, yeah.		
	89:05 QUESTIONS BY MR. KIEFFER:		
	89:06 Q. And what was your understanding		
	89:07 of how he was associated with JUUL?		
89:10 - 89:18	Wakefield, Chamesheann 2022-10-14	00:00:21	WC_v13.76
	89:10 THE WITNESS: Founders.		
	89:11 QUESTIONS BY MR. KIEFFER:		
	89:12 Q. One of the founders?		
	89:13 A. Yeah.		
	89:14 Q. Evan, can we just pull up next		
	89:15 to that the color photo we were looking at in		
 WAKEFIELD-8.	89:16 the last exhibit?		
1.2			
	89:17 A. Oh, I'll hand you that back.		
	89:18 Yeah.		
89:19 - 89:23	Wakefield, Chamesheann 2022-10-14	00:00:14	WC_v13.77
	89:19 Q. And as far as it appears to		
 WAKEFIELD-8.	89:20 you, is this the same gentleman on the photo		
1.3			
	89:21 on the left on our screen as we saw in the		
	89:22 prior exhibit standing some ways behind Frank		
	89:23 Perdomo and Nick Delgado?		



WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
89:25 - 89:25	Wakefield, Chamesheann 2022-10-14 89:25 THE WITNESS: Yes.	00:00:01	WC_v13.78
90:06 - 90:15	Wakefield, Chamesheann 2022-10-14	00:00:29	WC_v13.79
 WAKEFIELD-9.1.1	90:06 And during the course of this 90:07 JUUL launch party in June 2015, do you recall 90:08 whether you met either of the folks in that 90:09 particular photo, Exhibit 9? 90:10 A. I didn't meet -- I did not meet 90:11 the female, but I'm pretty sure I've met this 90:12 guy, too, with this -- with the previous 90:13 male. 90:14 Q. Okay. You met them together? 90:15 A. Yes.		
91:05 - 91:09	Wakefield, Chamesheann 2022-10-14	00:00:12	WC_v13.80
 WAKEFIELD-9.1.2	91:05 Q. And are those two individuals, 91:06 the men shown in Exhibit 8 and Exhibit 9, are 91:07 those the ones that you recall being 91:08 introduced to as founders of JUUL? 91:09 A. Yes.		
91:10 - 92:01	Wakefield, Chamesheann 2022-10-14 91:10 Q. Do you recall either of the men 91:11 that are shown in Exhibit 8 or Exhibit 9 91:12 saying anything specific to you that evening? 91:13 A. Just, you know, thank you for 91:14 having -- they just thanked me for being 91:15 there and like, you know, bringing people and 91:16 just curating vibes honestly. 91:17 Q. They thanked you -- I want to 91:18 make sure I heard you. They thanked you for 91:19 being there, bringing people and, did you 91:20 say, curating vibes? 91:21 A. Yes. 91:22 Q. Explain what you mean with 91:23 that. 91:24 A. I mean, just like bringing my 91:25 audience kind of brought a different 92:01 aesthetic to the party itself.	00:00:40	WC_v13.81





WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
92:23 - 93:10	Wakefield, Chamesheann 2022-10-14	00:00:40	WC_v13.82
 Clear	92:23 Q. Show you what we've marked as		
	92:24 Exhibit 10.		
 WAKEFIELD-1 0.1.1	92:25 Have you seen that before?		
	93:01 A. Yes.		
	93:02 Q. Okay. And again, I don't want		
	93:03 to be tedious, but I do want to be complete.		
	93:04 Can you just go around that		
	93:05 photograph and tell us the names and the ages		
	93:06 of the folks that are in that picture?		
	93:07 A. Zoe Nochlin, 18; Sam Bouiss, 18		
	93:08 to 19, pretty sure 18; myself, 18; Talulah,		
	93:09 18; Tarik, 21; Tino, 18; and Nick Delgado,		
	93:10 between 19 and 21.		
93:16 - 94:05	Wakefield, Chamesheann 2022-10-14	00:00:33	WC_v13.83
	93:16 Q. Yeah. What is this?		
	93:17 A. This is -- we took a photo in		
	93:18 front of like a white backdrop kind of thing.		
	93:19 Q. And was this photo, can you		
	93:20 tell, was it posted to social media?		
	93:21 A. Yeah, this is an Instagram		
	93:22 post.		
	93:23 Q. Okay. Who made that Instagram		
	93:24 post?		
	93:25 A. Douglas.		
	94:01 Q. And can you read what he has		
 WAKEFIELD-1 0.1.2	94:02 written there with his post?		
	94:03 A. "You mad bro, exclamation		
	94:04 point, #juul, #juulvapor, #vaporized,		
	94:05 #lightscameravapor.		
95:12 - 95:23	Wakefield, Chamesheann 2022-10-14	00:00:22	WC_v13.84
 WAKEFIELD-1 0.1.3	95:12 Q. You see where it says		
	95:13 "juulvapor squad"?		
	95:14 A. Yeah.		
	95:15 Q. Do you know what that		
	95:16 represents?		
	95:17 A. Squad. Like we're the squad.		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	95:18 Q. And who made that post, if you		
	95:19 know, that says "squad"?		
	95:20 A. JUUL.		
	95:21 Q. JUUL the company?		
	95:22 A. Yeah, the company. Whoever was		
	95:23 doing their social media.		
96:04 - 96:05	Wakefield, Chamesheann 2022-10-14	00:00:06	WC_v13.85
 Clear	96:04 Q. Evan, can we pull up Tab		
 WAKEFIELD-1	96:05 Number 8, which I believe will be Exhibit 11?		
1.1.1			
96:06 - 96:07	Wakefield, Chamesheann 2022-10-14	00:00:02	WC_v13.86
	96:06 Can you blow that up a little		
 WAKEFIELD-1	96:07 bit, Evan?		
1.1.2			
96:08 - 98:03	Wakefield, Chamesheann 2022-10-14	00:01:33	WC_v13.87
	96:08 Do you recognize what this is?		
	96:09 A. Yeah, it's a photo of Mimi		
	96:10 Sweeney and Lucy Borden.		
	96:11 Q. Okay. How old were they at the		
	96:12 time?		
	96:13 A. 17.		
	96:14 Q. And do you know, was this photo		
	96:15 taken at the JUUL launch party?		
	96:16 A. Yes, in front of one of those		
	96:17 projector walls.		
	96:18 Q. And was it posted to social		
	96:19 media?		
	96:20 A. Yes, this isn't -- this is an		
	96:21 Instagram post as well.		
 WAKEFIELD-1	96:22 Q. Okay. And can you tell who		
1.1.6			
	96:23 posted that?		
	96:24 A. Simon Ackerman.		
	96:25 Q. Do you know who Simon Ackerman		
	97:01 is?		
	97:02 A. Yes.		
	97:03 Q. Who is he?		
	97:04 A. A photographer that I invited.		
	97:05 Q. You invited Simon Ackerman?		
	97:06 A. Yeah.		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
 WAKEFIELD-1 1.1.4	97:07 Q. Okay. At the bottom of this		
	97:08 exhibit, can you tell us what the date is?		
	97:09 A. June 5, 2015.		
	97:10 Q. All right. And up toward the		
	97:11 top under Mr. Acker -- where it first says		
 WAKEFIELD-1 1.1.5	97:12 "Simon Ackerman," did he post something?		
	97:13 A. He posted this photo.		
	97:14 Q. Okay. And did he write		
	97:15 something also?		
	97:16 A. He wrote, "Last night's JUUL		
	97:17 event with @msweenz #chelsea, #nyc."		
	97:18 Q. Okay. What does @msweenz mean?		
	97:19 A. At Mimi Sweeney.		
	97:20 Q. Was that a social media account		
	97:21 or a social media name that Ms. Sweeney used?		
	97:22 A. Yeah, that was her Instagram.		
	97:23 It's still -- I believe it's still her		
	97:24 Instagram, yeah.		
	97:25 Q. And Mr. Ackerman's post that		
	98:01 you just read, after @msweenz it says,		
	98:02 "#chelsea, #nyc"; is that right?		
	98:03 A. Yes.		
99:17 - 99:19  Clear	Wakefield, Chamesheann 2022-10-14	00:00:07	WC_v13.88
	99:17 Q. Okay. Did you understand when		
	99:18 Mr. Perrett asked you to help promote this		
	99:19 event that he was working with JUUL?		
99:21 - 99:21	Wakefield, Chamesheann 2022-10-14	00:00:01	WC_v13.89
	99:21 THE WITNESS: Yes.		
106:10 - 106:25	Wakefield, Chamesheann 2022-10-14	00:00:31	WC_v13.90
 WAKEFIELD-1 2.1.1	106:10 Q. And that's Exhibit 12 we just		
	106:11 handed you.		
	106:12 Do you have that in front of		
	106:13 you?		
	106:14 A. Yes.		
	106:15 Q. This is a document that we got		
	106:16 from JUUL's files in this case, and on the		
	106:17 front cover you see where it says "PAX Labs"?		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	106:18 A. Yes.		
 WAKEFIELD-1 2.1.2	106:19 Q. And then underneath that it		
	106:20 says, "Events and Experiential Marketing,		
	106:21 2015 Recap"?		
	106:22 A. Yes.		
 WAKEFIELD-1 2.6.1	106:23 Q. Okay. Evan, can you turn us to		
	106:24 the sixth page of the document, which on the		
	106:25 lower right-hand corner ends in 6993?		
107:08 - 108:13	Wakefield, Chamesheann 2022-10-14	00:01:21	WC_v13.91
 WAKEFIELD-1 2.6.2	107:08 Under the heading June 4, it		
	107:09 says, "JUUL celebrated its launch with a		
	107:10 party at NYC's Jack Studios. The party		
	107:11 featured an open bar, passed hors d'oeuvres,		
	107:12 vape bar where JUUL was sampled and gifted to		
	107:13 each guest, a live photo shoot with JUUL		
	107:14 campaign photographer, Marley Kate."		
	107:15 Do you see that?		
	107:16 A. Yes.		
	107:17 Q. Does that description seem to		
	107:18 pretty well describe the launch event that		
	107:19 you attended?		
	107:20 A. Yes.		
 WAKEFIELD-1 2.6.1	107:21 Q. Take a look at the lower		
 WAKEFIELD-1 2.6.3	107:22 right-hand paragraph on that page.		
	107:23 Evan, can you blow that up for		
	107:24 us?		
	107:25 Do you recognize any of the		
	108:01 folks in that photograph?		
	108:02 A. Yes.		
	108:03 Q. Can you tell us who you		
	108:04 recognize? Their names and their ages.		
	108:05 A. Oh, this one. Okay. Nick		
	108:06 Delgado, Talulah Gilroy, Tino Tsanos and Zoe		
	108:07 Nochlin. But also there is the photo on the		
	108:08 left, like the first one, and I believe Frank		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	108:09 Perdomo is in that one.		
	108:10 Q. Okay.		
	108:11 A. The little base next to the kid		
	108:12 in the hat and Milah -- and Bianca is in the		
	108:13 background of that one, too.		
109:21 - 110:08	Wakefield, Chamesheann 2022-10-14	00:00:33	WC_v13.92
 WAKEFIELD-1 2.6.1	109:21 Q. Evan, if you'd go to the		
 WAKEFIELD-1 2.6.4	109:22 photograph on the left of the bar. There we		
	109:23 go. With the silver bowls.		
	109:24 What is shown in that		
	109:25 photograph?		
	110:01 A. This is where you got -- this		
	110:02 is the sampling bar where you got JUULs and		
	110:03 also kind of figured out what they were. And		
	110:04 like in the -- oh, yeah, they did have the		
	110:05 yellow flavor.		
	110:06 These, like, silver bowls each		
	110:07 had the pod -- the JUUL, you push the pod in,		
	110:08 so these are where the pods were as well.		
110:13 - 110:14	Wakefield, Chamesheann 2022-10-14	00:00:03	WC_v13.93
 WAKEFIELD-1 2.6.1	110:13 Q. Evan, let's go back to the --		
	110:14 just the full page of that exhibit.		
110:23 - 111:02	Wakefield, Chamesheann 2022-10-14	00:00:13	WC_v13.94
 WAKEFIELD-1 2.6.3	110:23 Q. In the photograph on the right,		
	110:24 how many of those people were teenagers at		
	110:25 the time?		
	111:01 A. One, two, three, four -- four		
	111:02 on the right.		
111:09 - 111:10	Wakefield, Chamesheann 2022-10-14	00:00:02	WC_v13.95
 WAKEFIELD-1 3.2.1	111:09 EVAN WOLFE: This will be		
	111:10 Exhibit 13.		
113:14 - 113:15	Wakefield, Chamesheann 2022-10-14	00:00:07	WC_v13.96
 WAKEFIELD-1	113:14 Q. Evan, can you turn to the page		
	113:15 that ends in 2891?		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
3.14.1	113:15 that ends in 2891?		
113:23 - 114:01	Wakefield, Chamesheann 2022-10-14	00:00:08	WC_v13.97
 WAKEFIELD-1	113:23 Q. If you see in the text on the		
3.14.2	113:24 left where it says, "Launch party @ Jack		
	113:25 Studios 6/4"?		
	114:01 A. Yes.		
114:02 - 114:16	Wakefield, Chamesheann 2022-10-14	00:00:25	WC_v13.98
	114:02 Q. It says, "Launch party @ Jack		
	114:03 Studios 6/4; attracted key influencers and		
	114:04 amplified press buzz throughout the week."		
	114:05 Do you see that?		
	114:06 A. Yes.		
 WAKEFIELD-1	114:07 Q. And then take a look at the		
3.14.3	114:08 lower -- the picture in the lower right-hand		
	114:09 corner.		
	114:10 A. Right.		
	114:11 Q. Do you recognize either or both		
	114:12 of those people?		
	114:13 A. Yeah. Tino and Zoe.		
	114:14 Q. And what are their ages at the		
	114:15 time?		
	114:16 A. 18.		
115:15 - 115:18	Wakefield, Chamesheann 2022-10-14	00:00:07	WC_v13.99
 Clear	115:15 Q. To your memory, did some of		
	115:16 your friends post on social media about the		
	115:17 JUUL launch party?		
	115:18 A. Yes.		
115:19 - 115:21	Wakefield, Chamesheann 2022-10-14	00:00:04	WC_v13.100
	115:19 Q. Did a number of your friends		
	115:20 post on social media about the JUUL launch		
	115:21 party?		
115:23 - 116:08	Wakefield, Chamesheann 2022-10-14	00:00:24	WC_v13.101
	115:23 THE WITNESS: Yes. I'm pretty		
	115:24 sure we are -- I am the word of mouth,		
	115:25 if that makes any sense. That's what		
	116:01 I was kind of doing.		
	116:02 QUESTIONS BY MR. KIEFFER:		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	116:03 Q. Explain what you mean there.		
	116:04 A. Beyond -- Instagram was early		
	116:05 on at this point, so using Instagram worked,		
	116:06 but texting, talking, was really my forte.		
	116:07 So that's how I kind of got all these people		
	116:08 to come, just by word of mouth.		
117:08 - 117:08	Wakefield, Chamesheann 2022-10-14	00:00:01	WC_v13.102
	117:08 Q. And when you use the term "word		
117:09 - 117:13	Wakefield, Chamesheann 2022-10-14	00:00:17	WC_v13.103
	117:09 of mouth," can you tell us specifically what		
	117:10 you mean? For example, do you partly mean		
	117:11 in-person communications?		
	117:12 A. In-person, Snapchat, text,		
	117:13 Instagram, DM, stuff like that.		
118:02 - 118:05	Wakefield, Chamesheann 2022-10-14	00:00:07	WC_v13.104
	118:02 Q. Do you believe you spread word		
	118:03 of mouth about this JUUL launch party before		
	118:04 it even happened?		
	118:05 A. Yes.		
118:23 - 119:03	Wakefield, Chamesheann 2022-10-14	00:00:08	WC_v13.105
	118:23 Q. Okay. After the JUUL launch		
	118:24 party, did you also spread word of mouth		
	118:25 about JUUL?		
	119:01 A. Yes.		
	119:02 Q. Do you think you spread a lot		
	119:03 of it?		
119:05 - 119:05	Wakefield, Chamesheann 2022-10-14	00:00:01	WC_v13.106
	119:05 THE WITNESS: Yes.		
119:07 - 119:11	Wakefield, Chamesheann 2022-10-14	00:00:15	WC_v13.107
	119:07 Q. If I were to ask you for		
	119:08 how long after this launch party you		
	119:09 personally continued to spread word of mouth		
	119:10 about the JUUL product, what would your		
	119:11 answer be?		
119:13 - 120:08	Wakefield, Chamesheann 2022-10-14	00:00:47	WC_v13.108
	119:13 THE WITNESS: Two years		
	119:14 completely and then again -- I would		
	119:15 say from the party till right now.		


WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	119:16 Yeah.		
	119:17 QUESTIONS BY MR. KIEFFER:		
	119:18 Q. From the party until right		
	119:19 now --		
	119:20 A. Today.		
	119:21 Q. -- you believe you have		
	119:22 continued to spread word of mouth about the		
	119:23 JUUL product?		
	119:24 A. Yes.		
	119:25 So I would say fully two years		
	120:01 after the JUUL launch, I was like, JUUL,		
	120:02 JUUL. Yeah.		
	120:03 Q. Fully two years after the JUUL		
	120:04 launch you did what?		
	120:05 A. Like the two -- so from the		
	120:06 party and then the next two years, I was like		
	120:07 kind of promoting it because they didn't sell		
	120:08 it in stores for a while, so that was a...		
124:02 - 124:03	Wakefield, Chamesheann 2022-10-14	00:00:04	WC_v13.109
	124:02 Q. Hand you a copy of what's been		
	124:03 marked as Exhibit 15.		
124:04 - 124:07	Wakefield, Chamesheann 2022-10-14	00:00:11	WC_v13.110
 WAKEFIELD-1	124:04 Can you tell us what's shown		
5.1.1			
	124:05 there on the first page of Exhibit 15?		
	124:06 A. Another Instagram post. This		
	124:07 time it's from Mimi Sweeney and -- yeah.		
124:08 - 124:11	Wakefield, Chamesheann 2022-10-14	00:00:07	WC_v13.111
 WAKEFIELD-1	124:08 Q. And again, she goes by the name		
5.1.2			
	124:09 msweenz?		
	124:10 A. Yeah, @msweenz online, which is		
	124:11 Mimi Sweeney.		
124:12 - 124:12	Wakefield, Chamesheann 2022-10-14	00:00:01	WC_v13.112
	124:12 Q. And do you		
124:13 - 124:16	Wakefield, Chamesheann 2022-10-14	00:00:07	WC_v13.113
	124:13 recognize where this photo was taken?		
	124:14 A. Yes. At Jack Studios.		
	124:15 Q. At the JUUL launch party?		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	124:16 A. Yes.		
124:20 - 125:14	Wakefield, Camesheann 2022-10-14	00:00:48	WC_v13.114
	124:20 Q. And does this indicate that		
	124:21 this post was liked by anyone?		
 WAKEFIELD-1	124:22 A. Yes, 88 people. And myself.		
5.1.3			
	124:23 Q. You liked it also?		
	124:24 A. Yes.		
	124:25 Q. Okay. Turn, if you would, to		
 WAKEFIELD-1	125:01 the second page of Exhibit 15.		
5.2.1			
	125:02 A. Oh, she did a whole spread.		
	125:03 Yeah.		
	125:04 Q. Do you recognize what that is?		
	125:05 A. Another post from Mimi at the		
	125:06 event. At the sample bar.		
	125:07 Q. And did Mimi write something		
	125:08 when she posted that picture?		
 WAKEFIELD-1	125:09 A. She said, "@juul," and she		
5.2.2			
	125:10 added her sister @dylanrose and said, "We		
	125:11 need the JUUL phone case."		
	125:12 Q. Dylan Rose is Mimi Sweeney's		
	125:13 sister?		
	125:14 A. Her twin sister, yes.		
130:02 - 130:14	Wakefield, Camesheann 2022-10-14	00:00:30	WC_v13.115
 WAKEFIELD-1	130:02 Q. Okay. Okay. Turn the page, if		
5.3.1			
	130:03 you would, to the third page of Exhibit 15.		
	130:04 Can you tell us what that is?		
	130:05 A. So this is another Instagram		
	130:06 post from Mimi, and she hashtags juulvapor.		
	130:07 This is how you got into the billboard		
	130:08 campaign. See, they took Polaroid pictures		
	130:09 of each person.		
	130:10 Q. Okay.		
	130:11 A. And that was how they kept		
	130:12 track of -- it was kind of like a casting.		
	130:13 Q. Okay.		
	130:14 A. It was a casting.		



WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
132:18 - 132:22	Wakefield, Chamesheann 2022-10-14	00:00:10	WC_v13.116
 Clear	<p>132:18 Do you recall other of your</p> <p>132:19 guests posting pictures from the party to</p> <p>132:20 social media?</p> <p>132:21 A. Yes.</p> <p>132:22 Q. Most of them?</p>		
132:24 - 132:24	Wakefield, Chamesheann 2022-10-14	00:00:01	WC_v13.117
	132:24 THE WITNESS: Yes.		
134:05 - 134:12	Wakefield, Chamesheann 2022-10-14	00:00:13	WC_v13.118
 WAKEFIELD-1 3.14.4	<p>134:05 QUESTIONS BY MR. KIEFFER:</p> <p>134:06 Q. There's a reference here that</p> <p>134:07 we were talking about just a few minutes ago</p> <p>134:08 that says, "200 attendees amplified word</p> <p>134:09 mouth of via social media tagging and</p> <p>134:10 posting, touching 26K people."</p> <p>134:11 Do you see that?</p> <p>134:12 A. Yes.</p>		
134:13 - 134:14	Wakefield, Chamesheann 2022-10-14	00:00:04	WC_v13.119
	<p>134:13 Q. Did JUUL take off in your peer</p> <p>134:14 group shortly after this party?</p>		
134:16 - 135:25	Wakefield, Chamesheann 2022-10-14	00:01:18	WC_v13.120
 Clear	<p>134:16 THE WITNESS: Yes.</p> <p>134:17 QUESTIONS BY MR. KIEFFER:</p> <p>134:18 Q. Describe for us what happened.</p> <p>134:19 A. After the event, people were</p> <p>134:20 still like, oh, what is this? And then I</p> <p>134:21 think a week or two later everyone was</p> <p>134:22 calling me, just asking if I had any more.</p> <p>134:23 I would like bring, like, pods</p> <p>134:24 to my friends or like a battery because I had</p> <p>134:25 a -- actually, I had a bunch of extra, so</p> <p>135:01 the -- yeah.</p> <p>135:02 Q. And the people that were asking</p> <p>135:03 you if you had more JUUL, were some of those</p> <p>135:04 friends that came to the party with you?</p> <p>135:05 A. Yes.</p> <p>135:06 Q. Were there other people that</p> <p>135:07 you knew that got introduced to the JUUL</p>		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	135:08 product that weren't at the party?		
	135:09 A. Yes.		
	135:10 Q. How did that happen? Word of		
	135:11 mouth?		
	135:12 A. Word of mouth -- well, you had		
	135:13 to get -- in order for you to get JUUL at		
	135:14 that -- in those few months, it had to come		
	135:15 from me or someone at the party.		
	135:16 Like an example, there's a girl		
	135:17 who was there, Teedra Tupac [phonetic], and		
	135:18 she didn't get photographed because she		
	135:19 didn't want photos. But she didn't want to		
	135:20 use the JUUL. She gave it to her boyfriend.		
	135:21 He's been hooked since. So it's just like --		
	135:22 stuff like -- it's like literally -- I don't		
	135:23 know how to call -- what it's called, but I		
	135:24 guess it is word of mouth. You just kind of		
	135:25 like, try this, and then they're like, okay.		
136:09 - 136:11	Wakefield, Chamesheann 2022-10-14	00:00:03	WC_v13.121
	136:09 where did you go to		
	136:10 college your freshman year?		
	136:11 A. Stony Brook University.		
139:11 - 139:13	Wakefield, Chamesheann 2022-10-14	00:00:05	WC_v13.122
	139:11 Q. At this point in time, what did		
	139:12 you think of JUUL? Did you like using it?		
	139:13 A. Yes.		
139:15 - 139:24	Wakefield, Chamesheann 2022-10-14	00:00:20	WC_v13.123
	139:15 THE WITNESS: Just easy. I can		
	139:16 use it anywhere. That's convenient.		
	139:17 Like that was really the key is you		
	139:18 could just use it wherever you wanted		
	139:19 to - the train, class, home, in your		
	139:20 room, and your parents -- you know,		
	139:21 they wouldn't even -- you can't smell		
	139:22 it. So it's just so inconspicuous,		
	139:23 it's kind of just like it's not		
	139:24 happening, but it is.		
140:18 - 140:19	Wakefield, Chamesheann 2022-10-14	00:00:02	WC_v13.124
	140:18 Q. Do you still use JUUL today?		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	140:19 A. Yes.		
140:20 - 141:03	Wakefield, Chamesheann 2022-10-14	00:00:12	WC_v13.125
	140:20 Q. How frequently do you think you		
	140:21 use it?		
	140:22 A. All the time.		
	140:23 Q. What's all the time, if you can		
	140:24 give us an estimate?		
	140:25 A. Every day.		
	141:01 Q. Do you use it multiple times a		
	141:02 day?		
	141:03 A. Yes.		
143:06 - 143:09	Wakefield, Chamesheann 2022-10-14	00:00:16	WC_v13.126
	143:06 Q. If I asked you just to estimate		
	143:07 for me what percent of your social group you		
	143:08 think regularly uses JUUL to this day, what		
	143:09 would your estimate be?		
143:12 - 143:20	Wakefield, Chamesheann 2022-10-14	00:00:16	WC_v13.127
	143:12 THE WITNESS: 75 percent. And		
	143:13 then the ones who went to the event,		
	143:14 mostly all of them, yeah.		
	143:15 QUESTIONS BY MR. KIEFFER:		
	143:16 Q. What was the last part you said		
	143:17 after 75 percent?		
	143:18 A. The people who went to the		
	143:19 actual event completely all use JUUL still,		
	143:20 to this day.		
144:16 - 144:19	Wakefield, Chamesheann 2022-10-14	00:00:07	WC_v13.128
 WAKEFIELD-1	144:16 Q. Can you tell us what Exhibit 16		
6.1.1	144:17 is?		
	144:18 A. A post on Instagram from		
	144:19 Douglas.		
144:20 - 145:01	Wakefield, Chamesheann 2022-10-14	00:00:09	WC_v13.129
	144:20 Q. When you say "a post on		
	144:21 Instagram from Douglas," just so our record		
	144:22 is clear --		
 WAKEFIELD-1	144:23 A. Oh, @coacd, yeah.		
6.1.2	144:24 Q. Doug Perrett, who also goes by		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	144:25 the name COACD, right?		
	145:01 A. Yes.		
145:02 - 145:25	Wakefield, Chamesheann 2022-10-14	00:00:46	WC_v13.130
 WAKEFIELD-1 6.1.1	145:02 Q. Is this a photo of you?		
	145:03 A. Yes.		
	145:04 Q. And when was that photo taken?		
	145:05 A. On the day of the party.		
	145:06 Q. The day of the party.		
 WAKEFIELD-1 6.1.3	145:07 And this post has a date on the		
	145:08 bottom. It says June 4, 2015, right?		
	145:09 A. Yes.		
	145:10 Q. To you, does that indicate when		
	145:11 Mr. Perrett posted it?		
	145:12 A. Yes.		
 WAKEFIELD-1 6.1.4	145:13 Q. And then what did he write?		
	145:14 A. "New faces of juulvapor,		
	145:15 question mark, exclamation, exclamation."		
	145:16 Q. And that would have been tagged		
	145:17 the JUUL company account, right?		
	145:18 A. Yeah, @juulvapor.		
 WAKEFIELD-1 6.1.5	145:19 Q. And then there's something		
	145:20 underneath his post.		
	145:21 What is that?		
	145:22 A. It's my comment saying, "You		
	145:23 still connected with JUUL? My friends love		
	145:24 these things now."		
	145:25 Q. When did you make that comment?		
146:04 - 146:06	Wakefield, Chamesheann 2022-10-14	00:00:06	WC_v13.131
	146:04 THE WITNESS: Probably -- not		
	146:05 probably. After the event. Like way		
	146:06 after the event.		
146:09 - 146:09	Wakefield, Chamesheann 2022-10-14	00:00:02	WC_v13.132
	146:09 A. Like months after.		
146:23 - 146:25	Wakefield, Chamesheann 2022-10-14	00:00:07	WC_v13.133
	146:23 Q. Okay. Why were you asking		



WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	146:24 Mr. Perrett that question?		
	146:25 A. To get a box of JUULs.		
147:01 - 147:04	Wakefield, Chamesheann 2022-10-14	00:00:07	WC_v13.134
	147:01 Q. For yourself?		
	147:02 A. For me and my friends, yeah.		
	147:03 Q. Had you run out by that time?		
	147:04 A. Yes.		
154:14 - 155:16	Wakefield, Chamesheann 2022-10-14	00:01:04	WC_v13.135
 WAKEFIELD-2 1.1.1	154:14 Q. Exhibit 21 that you have there		
	154:15 in front of you is a document that we got		
	154:16 from JUUL's internal files in this case.		
 WAKEFIELD-2 1.1.2	154:17 And if you see the first page		
	154:18 of that, there's an e-mail, and the signature		
	154:19 line there says, "Chelsea Kania, brand		
	154:20 manager."		
	154:21 Do you see where I'm referring		
	154:22 to?		
	154:23 A. Yes.		
 WAKEFIELD-2 1.1.3	154:24 Q. If you look at the top line of		
	154:25 that e-mail, she writes, "Hey, guys, attached		
	155:01 are the reposts from influencers who took		
	155:02 pics at the press event/posted Times Square.		
	155:03 Lee, can you make sure we comment on them?		
	155:04 Better late than never...some of them have		
	155:05 really good reaches."		
	155:06 Do you see that?		
	155:07 A. Yes.		
	155:08 Q. And, Evan, can we go down to		
 WAKEFIELD-2 1.2.1	155:09 the first -- to the next page after that		
	155:10 e-mail? Blow that up.		
	155:11 Is that your picture as the		
	155:12 first photograph behind Ms. Kania's e-mail?		
	155:13 A. Yes.		
	155:14 Q. Your picture from the launch		
	155:15 party?		
	155:16 A. Yes.		


WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
156:06 - 156:08	Wakefield, Chamesheann 2022-10-14	00:00:06	WC_v13.136
 WAKEFIELD-2 1.1.3	156:06 Q. When you hear the phrase 156:07 "really good reaches," does that mean 156:08 something to you?		
156:10 - 156:10	Wakefield, Chamesheann 2022-10-14	00:00:01	WC_v13.137
	156:10 THE WITNESS: Yes.		
156:12 - 156:19	Wakefield, Chamesheann 2022-10-14	00:00:15	WC_v13.138
	156:12 THE WITNESS: It's like your 156:13 influence. 156:14 QUESTIONS BY MR. KIEFFER: 156:15 Q. Your influence? 156:16 A. Yeah, they're your digital -- 156:17 like it's how much -- like if I post a brand, 156:18 how many hits -- like hits or how many people 156:19 are going to see it, stuff like that.		
158:02 - 158:06	Wakefield, Chamesheann 2022-10-14	00:00:13	WC_v13.139
 Clear	158:02 Q. I just handed you, Tabby, 158:03 Exhibit 22.		
 WAKEFIELD-2 2.1.1	158:04 Can you tell us what that is? 158:05 A. An Instagram post from me at 158:06 the JUUL event.		
158:10 - 158:19	Wakefield, Chamesheann 2022-10-14	00:00:15	WC_v13.140
 WAKEFIELD-2 2.1.2	158:10 Q. There's a date in the lower 158:11 right-hand corner that says October 11, 2016. 158:12 A. Yes. 158:13 Q. Did you make that post on that 158:14 date? 158:15 A. Yes. 158:16 Q. So you were basically making a 158:17 post but showing a picture from the launch 158:18 party back on June 4th of 2015? 158:19 A. Yes.		
158:20 - 159:01	Wakefield, Chamesheann 2022-10-14	00:00:17	WC_v13.141
 WAKEFIELD-2 2.1.1	158:20 Q. Okay. Does this Instagram post 158:21 that you made indicate that it was liked by		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	158:22 other people?		
	158:23 A. Yes.		
 WAKEFIELD-2 2.1.3	158:24 Q. How many people liked your post		
	158:25 on October 11, 2016?		
	159:01 A. 136.		
159:04 - 159:22	Wakefield, Chamesheann 2022-10-14	00:00:32	WC_v13.142
 WAKEFIELD-2 2.1.4	159:04 Over in the right-hand column		
	159:05 there's names there, lumia.nocito, for		
	159:06 example, msweenz.		
	159:07 Do you see those?		
	159:08 A. Yes.		
	159:09 Q. Are those comments?		
	159:10 A. Yes.		
	159:11 Q. I want to ask you about a		
	159:12 couple of the comments folks made.		
	159:13 Okay?		
	159:14 A. Sounds good.		
	159:15 Q. One of the people who commented		
	159:16 on this post in Exhibit 22 here at the		
 WAKEFIELD-2 2.1.5	159:17 bottom, it looks the name is chiosse?		
	159:18 A. Yes.		
	159:19 Q. Did I say that right?		
	159:20 A. Yes.		
	159:21 Q. Who is chiosse?		
	159:22 A. He's my friend, yeah.		
159:23 - 160:01	Wakefield, Chamesheann 2022-10-14	00:00:06	WC_v13.143
	159:23 Q. And what did he comment?		
	159:24 A. "JUUL squa."		
	159:25 Q. Okay. That's what, squad?		
	160:01 A. Yeah.		
160:05 - 160:09	Wakefield, Chamesheann 2022-10-14	00:00:05	WC_v13.144
	160:05 Q. Do you follow chiosse on social		
	160:06 media?		
	160:07 A. Yes.		
	160:08 Q. And he follows you?		
	160:09 A. Yes.		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
160:17 - 160:19	Wakefield, Chamesheann 2022-10-14	00:00:04	WC_v13.145
 WAKEFIELD-2 3.1.1	160:17 Q. Do you have Exhibit 23 there in 160:18 front of you? 160:19 A. Yes.		
160:20 - 160:21	Wakefield, Chamesheann 2022-10-14	00:00:05	WC_v13.146
	160:20 Q. What is Exhibit 23? 160:21 A. Chi Ossi's Instagram page.		
160:22 - 160:23	Wakefield, Chamesheann 2022-10-14	00:00:03	WC_v13.147
	160:22 Q. Is that a profile page? 160:23 A. Yes.		
160:24 - 161:04	Wakefield, Chamesheann 2022-10-14	00:00:10	WC_v13.148
 WAKEFIELD-2 3.1.2	160:24 Q. How many followers does it 160:25 indicate that Mr. Ossi has? 161:01 A. 25.1K. 161:02 Q. And what do you understand that 161:03 to mean? 161:04 A. A lot of followers.		
164:03 - 164:08	Wakefield, Chamesheann 2022-10-14	00:00:14	WC_v13.149
	164:03 Q. And when he commented on your 164:04 post where he wrote "JUUL squa," is it your 164:05 understanding as somebody who uses Instagram 164:06 that when he did that, any of his 25,000 164:07 followers could see that comment if they 164:08 chose to look at it?		
164:13 - 164:13	Wakefield, Chamesheann 2022-10-14	00:00:01	WC_v13.150
	164:13 THE WITNESS: Yes.		
169:15 - 169:24	Wakefield, Chamesheann 2022-10-14	00:00:23	WC_v13.151
 WAKEFIELD-2 2.1.1	169:15 Q. Turning our attention back to 169:16 that October 2016 post of yours, the one 169:17 where Mimi Sweeney and 135 other people had 169:18 liked it? 169:19 A. Yes. 169:20 Q. If we added up all of the 169:21 followers of all those people who liked that 169:22 one post and we came up with a total of more		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	169:23 than 600,000 followers, would that surprise 169:24 you?		
170:02 - 170:09	Wakefield, Chamesheann 2022-10-14	00:00:16	WC_v13.152
	170:02 THE WITNESS: No, it wouldn't 170:03 surprise me. 170:04 QUESTIONS BY MR. KIEFFER: 170:05 Q. Is that because you have a lot 170:06 of Instagram followers? 170:07 A. Yes. And a lot of important -- 170:08 or influential people interact with my stuff 170:09 as well, my content.		
172:22 - 173:05	Wakefield, Chamesheann 2022-10-14	00:00:10	WC_v13.153
 WAKEFIELD-2 7.1.1	172:22 Q. What is Exhibit 27? 172:23 A. A tweet from Alyssa Bourne 172:24 Peters. 172:25 Q. And do you know Alyssa Bourne 173:01 Peters? 173:02 A. Yes. 173:03 Q. Did she attend the JUUL launch 173:04 party with you? 173:05 A. Yes.		
173:06 - 173:08	Wakefield, Chamesheann 2022-10-14	00:00:03	WC_v13.154
	173:06 Q. Do you follow her on 173:07 social media? 173:08 A. Yes.		
173:09 - 173:11	Wakefield, Chamesheann 2022-10-14	00:00:05	WC_v13.155
	173:09 Q. Would you typically have seen 173:10 this post when she made it because you follow 173:11 her?		
173:14 - 173:14	Wakefield, Chamesheann 2022-10-14	00:00:01	WC_v13.156
	173:14 THE WITNESS: Yes.		
173:16 - 173:22	Wakefield, Chamesheann 2022-10-14	00:00:17	WC_v13.157
 WAKEFIELD-2 7.1.2	173:16 Q. What's the date of this tweet? 173:17 A. June 22, 2019, at 9:25 p.m. 173:18 Q. Would you read for us what 173:19 Alyssa Bourne Peters tweeted?  WAKEFIELD-2		
	173:20 A. "Fuck, do I buy another JUUL or		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
7.1.3	173:20 A. "Fuck, do I buy another JUUL or 173:21 take the L and quit smoking bad things, 173:22 question mark, question mark."		
174:05 - 174:11	Wakefield, Chamesheann 2022-10-14 174:05 Q. do you still see 174:06 Alyssa Bourne Peters? 174:07 A. Yes. 174:08 Q. Communicate with her? 174:09 A. Yes. 174:10 Q. As far as you know, was she 174:11 using JUUL as of June 2019?	00:00:09	WC_v13.158
174:14 - 174:14	Wakefield, Chamesheann 2022-10-14 174:14 THE WITNESS: Yes.	00:00:01	WC_v13.159
175:13 - 175:15  Clear	Wakefield, Chamesheann 2022-10-14 175:13 Q. Have some of your friends 175:14 continued to post about JUUL on social media 175:15 well after, long after, June of 2015?	00:00:08	WC_v13.160
175:18 - 175:22	Wakefield, Chamesheann 2022-10-14 175:18 THE WITNESS: Yes. 175:19 QUESTIONS BY MR. KIEFFER: 175:20 Q. Has Mimi Sweeney posted about 175:21 JUUL on social media since that party in June 175:22 of 2015?	00:00:11	WC_v13.161
175:25 - 175:25	Wakefield, Chamesheann 2022-10-14 175:25 THE WITNESS: Yes.	00:00:01	WC_v13.162
176:08 - 176:12	Wakefield, Chamesheann 2022-10-14 176:08 Q. We just handed you Exhibit 28, 176:09 which has nine pages to it. I want to 176:10 briefly ask you about what is in that 176:11 exhibit. 176:12 Okay?	00:00:10	WC_v13.163
176:13 - 176:15  WAKEFIELD-2 8.1.1	Wakefield, Chamesheann 2022-10-14 176:13 Do you recognize what is marked 176:14 there as page 1 in Exhibit 28? 176:15 A. Yes.	00:00:05	WC_v13.164
176:18 - 176:23	Wakefield, Chamesheann 2022-10-14 176:18 QUESTIONS BY MR. KIEFFER:	00:00:08	WC_v13.165

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	176:19 Q. Do you continue to follow Mimi Sweeney on Instagram?		
	176:20 A. Yes.		
	176:22 Q. And have you since 2016?		
	176:23 A. Yes.		
179:01 - 179:05	Wakefield, Chamesheann 2022-10-14	00:00:13	WC_v13.166
 WAKEFIELD-2 8.3.1	179:01 Q. Turn, if you would, to the third page of Exhibit 28.		
	179:03 Can you tell us what that is?		
	179:04 A. Another picture -- oh, Mimi Sweeney's Instagram page and a picture.		
179:09 - 179:11	Wakefield, Chamesheann 2022-10-14	00:00:04	WC_v13.167
 WAKEFIELD-2 8.3.2	179:09 Q. And is this dated November 28, 2017?		
	179:11 A. Yes.		
179:21 - 179:23	Wakefield, Chamesheann 2022-10-14	00:00:06	WC_v13.168
	179:21 THE WITNESS: On this one, you can actually see I liked it. The little second small circle is my face.		
180:01 - 180:04	Wakefield, Chamesheann 2022-10-14	00:00:07	WC_v13.169
 WAKEFIELD-2 8.3.3	180:01 QUESTIONS BY MR. KIEFFER: 180:02 Q. And is Mimi Sweeney holding a JUUL in that photograph?		
	180:04 A. In her right hand, yes.		
181:10 - 181:17	Wakefield, Chamesheann 2022-10-14	00:00:18	WC_v13.170
 WAKEFIELD-2 8.5.1	181:10 Turn to page 5 of Exhibit 28, if you would.		
	181:12 A. Yes.		
	181:13 Q. And what is page 5 of Exhibit 28?		
 WAKEFIELD-2 8.5.2	181:15 A. Mimi Sweeney's Instagram photo from May 11, 2019. She is also holding a JUUL in this photo.		
182:19 - 182:24	Wakefield, Chamesheann 2022-10-14	00:00:22	WC_v13.171

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
 WAKEFIELD-2 8.7.1	182:19 Q. Turn to page 7 of Exhibit 28.		WC_v13.171
	182:20 What is page 7 of Exhibit 28?		
 WAKEFIELD-2 8.7.2	182:21 A. A year later, Mimi Sweeney,		
	182:22 October 12, 2020, a picture from her		
	182:23 Instagram, and she also has a JUUL in this		
	182:24 photo as well.		
183:25 - 184:07	Wakefield, Chamesheann 2022-10-14	00:00:21	WC_v13.172
 WAKEFIELD-2 8.9.1	183:25 And turn, if you would, to		
	184:01 page 9 of Exhibit 28.		
	184:02 A. Oh, yeah.		
	184:03 Q. Can you tell us what that is?		
 WAKEFIELD-2 8.9.2	184:04 A. A picture of Mimi Sweeney from		
	184:05 her Instagram on my birthday, coincidentally,		
	184:06 June 19th of this year. That's why they		
	184:07 didn't add the year date on that.		
184:16 - 184:21	Wakefield, Chamesheann 2022-10-14	00:00:21	WC_v13.173
 Clear	184:16 Q. Based on the photos that we		
	184:17 just looked at, does it appear to you that		
	184:18 Ms. Sweeney posted on Instagram holding a		
	184:19 JUUL at least once every year in every year		
	184:20 following the launch party in 2015?		
	184:21 A. Yes.		
184:25 - 185:06	Wakefield, Chamesheann 2022-10-14	00:00:13	WC_v13.174
 WAKEFIELD-2 2.1.6	184:25 If you look at this one --		
	185:01 Q. Yes.		
	185:02 A. -- you can see she commented.		
 WAKEFIELD-2 2.1.7	185:03 She says, "Stay loyal to mine since the		
	185:04 promo," which would be since the launch		
	185:05 party, which everything -- this is sad to		
	185:06 see, in my opinion.		
189:24 - 189:25	Wakefield, Chamesheann 2022-10-14	00:00:02	WC_v13.175
 Clear	189:24 Q. Did you understand it had		
	189:25 nicotine in it?		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
190:02 - 190:02	Wakefield, Chamesheann 2022-10-14 190:02 THE WITNESS: Yes.	00:00:00	WC_v13.176
190:05 - 190:09	Wakefield, Chamesheann 2022-10-14 190:05 Q. Did you know anything about the 190:06 amount or the concentration of nicotine? 190:07 A. No. It kind of was like a 190:08 water vapor cigarette -- water vapor with 190:09 nicotine was the -- what I knew.	00:00:14	WC_v13.177
196:01 - 196:05	Wakefield, Chamesheann 2022-10-14 196:01 Q. I introduced myself previously. 196:02 I'm Kate Katz from Kirkland & Ellis. 196:03 A. Okay. 196:04 Q. I represent JUUL Labs in this 196:05 litigation.	00:00:08	WC_v13.178
196:12 - 197:01	Wakefield, Chamesheann 2022-10-14 196:12 Q. And just to start, most of your 196:13 testimony was about the JUUL launch event 196:14 that you attended. 196:15 That was on June 4, 2015, 196:16 correct? 196:17 A. Yes. 196:18 Q. And that was more than seven 196:19 years ago at this point, right? 196:20 A. Yes. 196:21 Q. And how many hours were you at 196:22 Jack Studio for the JUUL launch event? 196:23 A. Four hours, four, five hours. 196:24 Q. Is that the only JUUL event 196:25 you've ever attended? 197:01 A. Yes.	00:00:25	WC_v13.179
205:14 - 205:19	Wakefield, Chamesheann 2022-10-14 205:14 Q. Okay. And you've never lived 205:15 in San Francisco full-time, right? 205:16 A. No. 205:17 Q. Have you ever gone to school in 205:18 San Francisco? 205:19 A. No.	00:00:07	WC_v13.180
206:23 - 207:04	Wakefield, Chamesheann 2022-10-14 206:23 Q. Do you have any friends who	00:00:16	WC_v13.181

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	206:24 attended the San Francisco Unified School District?		
	206:25 District?		
	207:01 A. Not --		
	207:02 Q. Attended school in the San Francisco Unified School District? Sorry.		
	207:03		
	207:04 A. No. Like -- no.		
207:05 - 207:11	Wakefield, Chamesheann 2022-10-14	00:00:17	WC_v13.182
	207:05 Q. Did you invite anyone from San Francisco to the JUUL launch event?		
	207:06		
	207:07 A. Oh, my God. Lucy might be from San Francisco, but -- I'll just say no. No.		
	207:08		
	207:09 Q. Okay. Let me clarify the question.		
	207:10		
	207:11 A. Yes.		
207:12 - 207:21	Wakefield, Chamesheann 2022-10-14	00:00:15	WC_v13.183
	207:12 Q. Did you invite anyone to the launch event who was --		
	207:13		
	207:14 A. Ever in San Francisco?		
	207:15 Q. -- living in San Francisco at the time of the launch event?		
	207:16		
	207:17 A. No.		
	207:18 Q. Okay. Are you aware of anyone who attended the launch event who was from San Francisco?		
	207:19		
	207:20		
	207:21 A. No.		
207:22 - 208:06	Wakefield, Chamesheann 2022-10-14	00:00:25	WC_v13.184
	207:22 Q. In 2015, can you identify any social media followers of yours who were from San Francisco back in 2015?		
	207:23		
	207:24		
	207:25 A. No, not at the moment.		
	208:01 Q. Are you aware of any JUUL events that occurred in San Francisco?		
	208:02		
	208:03 A. No.		
	208:04 Q. You never attended any JUUL events in San Francisco, right?		
	208:05		
	208:06 A. No.		
208:07 - 208:10	Wakefield, Chamesheann 2022-10-14	00:00:08	WC_v13.185
	208:07 Q. When you attended the JUUL launch event on June 4, 2015, that was after		
	208:08		

WC_v13 - Wakefield, Chamesheann SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	208:09 your first year of college, correct?		
	208:10 A. Yes.		

PLF AFFIRMATIVE	00:43:42
DEF COUNTER	00:01:46
PLF COUNTER-COUNTER	00:00:17
TOTAL RUN TIME	00:45:45



Documents linked to video:

WAKEFIELD-1
 WAKEFIELD-2
 WAKEFIELD-3
 WAKEFIELD-7
 WAKEFIELD-8
 WAKEFIELD-9
 WAKEFIELD-10
 WAKEFIELD-11
 WAKEFIELD-12
 WAKEFIELD-13
 WAKEFIELD-15
 WAKEFIELD-16
 WAKEFIELD-21
 WAKEFIELD-22
 WAKEFIELD-23
 WAKEFIELD-27
 WAKEFIELD-28

EXHIBIT 2

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE JUUL LABS, INC.,
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

Case No. 19-md-02913-WHO

**JOINT STIPULATION IDENTIFYING
TRIAL EXHIBITS USED IN THE
VIDEOTAPED DEPOSITION OF TABITHA
WAKEFIELD PLAYED AT TRIAL**

This Document Relates to:

***San Francisco Unified School District v.
Juil Labs, Inc. et al., Case No. 3:19-cv-
08177***

WHEREAS, Plaintiff called Tabitha Wakefield, whose videotaped deposition was played to the jury.

WHEREAS, the exhibit numbers in the videotaped deposition are different from the Trial Exhibit numbers.

WHEREAS, to most efficiently clarify the record, the parties, by and through their undersigned counsel, hereby stipulate and agree that the chart below accurately reflects the deposition exhibits introduced during the videotaped testimony of Tabitha Wakefield and the corresponding Trial Exhibit Numbers¹:

¹ The parties reserve all objections regarding these exhibits.

DEPOSITION EXHIBIT NUMBER	TRIAL EXHIBIT NUMBER
Wakefield Exhibit 1	Plaintiff Trial Exhibit 3082
Wakefield Exhibit 2	Plaintiff Trial Exhibit 3079
Wakefield Exhibit 3	Plaintiff Trial Exhibit 3077
Wakefield Exhibit 7	Plaintiff Trial Exhibit 3158
Wakefield Exhibit 8	Plaintiff Trial Exhibit 2364
Wakefield Exhibit 9	Plaintiff Trial Exhibit 2351
Wakefield Exhibit 10	Plaintiff Trial Exhibit 639
Wakefield Exhibit 11	Plaintiff Trial Exhibit 2458
Wakefield Exhibit 12	Plaintiff Trial Exhibit 821
Wakefield Exhibit 13	Plaintiff Trial Exhibit 916
Wakefield Exhibit 15	Plaintiff Trial Exhibit 3151
Wakefield Exhibit 16	Plaintiff Trial Exhibit 2412
Wakefield Exhibit 21	Plaintiff Trial Exhibit 2310
Wakefield Exhibit 22	Plaintiff Trial Exhibit 2267
Wakefield Exhibit 23	Plaintiff Trial Exhibit 2281
Wakefield Exhibit 27	Plaintiff Trial Exhibit 2274
Wakefield Exhibit 28	Plaintiff Trial Exhibit 3152

Respectfully submitted,

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